

September 5, 2007

MEMORANDUM TO: Those on the Attached List

FROM: Luis A. Reyes */RA/*  
Executive Director for Operations

SUBJECT: GUIDANCE FOR PERIODIC REVIEW OF AGENCY NETWORK  
DRIVES FOR THE PRESENCE OF PERSONALLY  
IDENTIFIABLE INFORMATION

As a result of Office of the Inspector General (OIG) Audit OIG-06-A-14, concerning personal privacy information found on shared network drives, each office/region was directed to review data generated or stored on shared drives for Personally Identifiable Information (PII). As of April 18, 2007, these searches of agency shared drives for PII were completed and all PII that was identified was either removed from the shared drives or access to it was restricted to individuals with a "need to know." Staff should not place PII on agency shared drives unless access to it is restricted to individuals with a "need to know."

The same OIG audit also recommended the development of policies and procedures for periodically reviewing agency network drives for the presence of PII. Effective with the date of this memorandum, I have approved the following guidance for reviewing agency shared drives for PII:

- The NRC will review all agency shared drives for the purposes of identifying and eliminating PII at least annually.
- Beginning in January of each year, the Office of Information Services (OIS) will search all agency-shared drives for files potentially containing PII. Search strings will be used and identified files will be grouped by the originating office/region by OIS. No later than January 31<sup>st</sup> of each year, the OIS will provide each office/region with its list of files that may contain PII.
- With OIS concurrence, offices/regions may arrange with OIS for more frequent searches (but no more than one per quarter). Based on their expressed interest in conducting their own searches and their capability to do so, regions may perform their own searches but must coordinate with OIS to ensure they have the current search criteria.

CONTACT: Russell Nichols, IRSD/OIS  
(301) 415-6874

- Each search will begin where the previous search finished, i.e., the cutoff date for the previous search will serve as the beginning date of the new search. Only files placed on the drive after the end date of the previous search, or previously existing files that were modified after the end date of the previous search, will be reviewed.
- Offices/regions will review the files identified by the OIS and determine whether or not each file contains PII. If a file contains PII, the office/region will determine if the file should remain on the drive and, if so, whether adequate access controls are in place. The office/region will restrict access to the file if adequate controls are not in place, and will remove the file from shared drives upon determining that the file is not appropriate for shared access or is no longer needed. Offices/regions will report to OIS no later than March 31<sup>st</sup> that they have reviewed the files and have taken appropriate action.

This policy will be incorporated into Management Directive 12.6 when it is updated to include all revised Sensitive Unclassified Non-Safeguards Information policy.

- Each search will begin where the previous search finished, i.e., the cutoff date for the previous search will serve as the beginning date of the new search. Only files placed on the drive after the end date of the previous search, or previously existing files that were modified after the end date of the previous search, will be reviewed.
- Offices/regions will review the files identified by the OIS and determine whether or not each file contains PII. If a file contains PII, the office/region will determine if the file should remain on the drive and, if so, whether adequate access controls are in place. The office/region will restrict access to the file if adequate controls are not in place, and will remove the file from shared drives upon determining that the file is not appropriate for shared access or is no longer needed. Offices/regions will report to OIS no later than March 31<sup>st</sup> that they have reviewed the files and have taken appropriate action.

This policy will be incorporated into Management Directive 12.6 when it is updated to include all revised Sensitive Unclassified Non-Safeguards Information policy.

**DISTRIBUTION: EDATS: OIS-2007-0026**

D. Ash, DEDIS/CIO	E. Baker, D/OIS	R Nichols, OIS/IRSD
W. Kane, DEDR	K. Greene, DD/OIS	200600352
M. Malloy, OEDO	J. Linehan, OIS/IRSD	07-054 (CIO)
V. Ordaz, AO	M. Thaggard, OIS/IRSD	OIG r/f
M. Virgilio, DEDMRT	M. Janney, OIS/IRSD	OIS r/f

**ADAMS Accession No.: ML071990107**

☐ Publicly Available      ☒ Non-Publicly Available    ☐ Sensitive    ☒ Non-Sensitive

OFFICE	QTE	OIS/ICOD	OIS/ICOD	OIS/BPIAD	OIS/BPIAD	Region I
NAME	L.Culp	J.Shields	J.Davis	M.Kemerer	N.Nguyen	L.Manning
DATE	06/21/2007	06/07/2007	05/22/2007	06/07/2007	06/06/2007	05/30/2007
OFFICE	Region II	Region III	Region IV	OIS/IRSD	OGC	OIS/IRSD
NAME	S.Flynn	R.Doornbos	J.Pellet	R.Nichols	T.Rothschild	M.Janney
DATE	06/12/2007	06/06/2007	06/04/2007	07/20/2007	06/22/2007	07/20/2007
OFFICE	IRSD/OIS	IRSD/OIS	<del>DD/OIS</del>	D/OIS	DEDIS/CIO	EDO
NAME	M.Thaggard	J.Linehan	<del>K.Greene</del>	E.Baker	D.Ash	L. Reyes
DATE	07/23/2007	07/26/2007	<del>08/1/2007</del>	08/24/2007	09/05/2007	09/05/2007

**OFFICIAL RECORD COPY**

MEMORANDUM TO THOSE ON THE ATTACHED LIST DATED: September 5, 2007

SUBJECT: GUIDANCE FOR PERIODIC REVIEW OF AGENCY NETWORK DRIVES FOR THE  
PRESENCE OF PERSONALLY IDENTIFIABLE INFORMATION

	<u>Mail Stop</u>
Frank P. Gillespie, Executive Director, Advisory Committee on Reactor Safeguards/Advisory Committee on Nuclear Waste and Materials	T-2 E26
E. Roy Hawkens, Chief Administrative Judge, Atomic Safety and Licensing Board Panel	T-3 F23
Karen D. Cyr, General Counsel	O-15 D21
John F. Cordes, Jr., Director, Office of Commission Appellate Adjudication	O-16 C1
William M. McCabe, Chief Financial Officer	T-9 F4
Hubert T. Bell, Inspector General	T-5 D28
Margaret M. Doane, Director, Office of International Programs	O-4 E21
Rebecca L. Schmidt, Director, Office of Congressional Affairs	O-16 C1
Eliot B. Brenner, Director, Office of Public Affairs	O-2 A13
Annette Vietti-Cook, Secretary of the Commission	O-16 C1
William F. Kane, Deputy Executive Director for Reactor and Preparedness Programs, OEDO	O-16 E15
Martin J. Virgilio, Deputy Executive Director for Materials, Waste, Research, State, Tribal, and Compliance Programs, OEDO	O-16 E15
Darren B. Ash, Deputy Executive Director for Information Services and Chief Information Officer, OEDO	O-16 E15
Vonna L. Ordaz, Assistant for Operations, OEDO	O-16 E15
Timothy F. Hagan, Director, Office of Administration	T-7 D26
Cynthia A. Carpenter, Director, Office of Enforcement	O-14 E1
Charles L. Miller, Director, Office of Federal and State Materials and Environmental Management Programs	T-8 F5
Guy P. Caputo, Director, Office of Investigations	O-3 F1
Edward T. Baker, Director, Office of Information Services	O-6 E3M
James F. McDermott, Director, Office of Human Resources	T-3 A2
R. William Borchardt, Director, Office of New Reactors	O-16 E15
Michael F. Weber, Director, Office of Nuclear Material Safety and Safeguards	EBB1
James E. Dyer, Director, Office of Nuclear Reactor Regulation	O-13 D13
Brian W. Sheron, Director, Office of Nuclear Regulatory Research	T-10 F12
Corenthis B. Kelley, Director, Office of Small Business and Civil Rights	T-2 C2
Roy P. Zimmerman, Director, Office of Nuclear Security and Incident Response	T-4 D22a
Samuel J. Collins, Regional Administrator, Region I	RGN-I
William D. Travers, Regional Administrator, Region II	RGN-II
James L. Caldwell, Regional Administrator, Region III	RGN-III
Bruce S. Mallett, Regional Administrator, Region IV	RGN-IV